

~~SEALED~~United States Courts  
Southern District of Texas  
FILEDUNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

JUN 26 2019

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

v.

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§  
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§

CRIMINAL NUMBER

C - 19 - 846

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

Between on or about September 1, 2015, and up to and including the date of this indictment in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

- (1) CAROL OLSON,
- (2) DAVID OLSON,
- (3) CHRISTOPHER PENSON, and
- (4) TIMOTHY VESELKA

did knowingly and intentionally conspire and agree together, with each other, and with other persons known and unknown to the Grand Jury, to possess with intent to distribute a controlled substance. This violation involved more than five (5) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

NOTICE OF CRIMINAL FORFEITURE  
(21 U.S.C. § 853(a))

I.

Pursuant to Title 21, United States Code, Section 853, as a result of the commission of a violation of Title 21, United States Code, Sections 846 and 841(a)(1), as alleged in Count One, notice is given to the defendants,

- (1) CAROL OLSON,
- (2) DAVID OLSON,
- (3) CHRISTOPHER PENSON, and
- (4) TIMOTHY VESELKA

that the following is subject to forfeiture:

- (1) all property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation and
- (2) all property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation.

## II. Money Judgment

Defendants are notified that, upon conviction, the property subject to forfeiture includes, but is not limited to, a money judgment payable to the United States of America in an amount equal to the total value of the property subject to forfeiture for which the defendants may be jointly and severally liable. The amount of the money judgment for Count One is estimated to be, but is not limited to, approximately \$500,000.00.

## III. Substitute Property

In the event the property that is subject to forfeiture, as a result of any act of omission of the defendants:

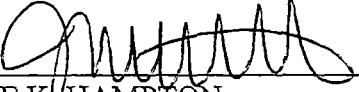
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or,
- (e) has been commingled with other property which cannot be divided without difficulty.

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the United States shall be entitled to seek forfeiture of any substitute property of the  
defendant pursuant to Title 21, United States Code, Section 853(p).

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A TRUE BILL:  
ORIGINAL SIGNATURE ON FILE  
FOREPERSON OF THE GRAND JURY

RYAN K. PATRICK  
UNITED STATES ATTORNEY

By: 

JULIE K. HAMPTON  
Assistant United States Attorney